

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>CHARLES GROSSMAN</b>	:	<b>CIVIL ACTION</b>
	:	
<b>vs.</b>	:	
	:	
<b>CITY OF PHILADELPHIA, et al.</b>	:	<b>NO. 02-4484</b>

**OFFER OF JUDGMENT**

TO: Alan Denenberg, Esquire  
ABRAMSON & DENEBOERG, P.C.  
1200 Walnut St., 6<sup>th</sup> Floor  
Philadelphia, PA 19107

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants hereby offer to allow Judgment to be taken against them and in favor of Plaintiff, for all claims for damages, costs, attorneys' fees and interest accrued to date, in the amount of Two Thousand (\$2,000) dollars.

This Offer of Judgment is made solely for the purposes specified in F. R. Civ. P. 68 and is not to be construed either as an admission that Defendants are liable in this action, or that Plaintiff has suffered any damages. Said judgment is to have no effect whatsoever except in settlement of this case. Additionally, this Offer of Judgment is not admissible as evidence in any proceeding, except, if accepted, in a proceeding to determine costs. If this Offer of Judgment is not accepted in writing within ten (10) days, it shall be deemed withdrawn.

Sincerely,

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Robin B. Arnold  
Deputy City Solicitor  
Attorney I.D. #59477  
City of Philadelphia Law Department  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 683-5447  
(215) 683-5347 (Fax)

Date: 3/9/04

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	<b>:</b>	
<b>vs.</b>	<b>:</b>	
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<b>CITY OF PHILADELPHIA, et al.</b>	<b>:</b>	<b>NO. 02-4484</b>

**CERTIFICATE OF SERVICE**

I, ROBIN B. ARNOLD, hereby certify that on the date below, I served a true and correct copy of Defendants' Rule 68 Offer of Judgment upon counsel listed below by first-class United States Mail, postage prepaid.

Alan Denenberg, Esquire  
ABRAMSON & DENEGER, P.C.  
1200 Walnut St., 6<sup>th</sup> Floor  
Philadelphia, PA 19107

BY: \_\_\_\_\_  
ROBIN B. ARNOLD  
Deputy City Solicitor  
1515 Arch Street, 14th Floor  
Philadelphia, PA 19102

DATE: 3/9/04